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September 22, 1995

**VIA HAND DELIVERY**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W. - Room 222  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: PR Docket No. 92-257  
RM-7956, RM-8031, RM8352

Dear Mr. Caton:

On behalf of Globe Wireless, we are filing an original and seven (7) copies of its  
Comments in the above-referenced matter.

If there are any questions, please communicate with the undersigned.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH, P.L.C.

*Leonard Robert Raish*

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Counsel for Globe Wireless

LRR:cej  
Enclosures

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BEFORE THE  
**Federal Communications Commission**

WASHINGTON, D.C. 20554

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SEP 22 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Amendment of the Commission's ) PR Docket No. 92-257  
Rules Concerning Maritime ) RM-7956  
Communications ) RM-8031  
 ) RM-8352

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To: The Commission

**COMMENTS BY GLOBE WIRELESS**

Globe Wireless, by its attorney, hereby submits the comments below on the Further Notice of Proposed Rulemaking ("Further Notice") in the above cited proceeding. The Further Notice was released on May 25, 1995. In the comments below, Globe Wireless supports virtually all of the proposals set forth in the Further Notice. Further Globe Wireless applauds the Commission for undertaking significant amendments to its Rules concerning Maritime Communications. The Commission's action is a positive contribution to safety of life at sea and to the advancement of cost effective commercial communications for the maritime industry.

**I. GENERAL**

Globe Wireless is a California Corporation with its headquarters located in Half Moon Bay, California. It operates a worldwide network of High Frequency (HF) telecommunications services in support of the maritime industry. These services are provided by Globe Wireless HF Coast stations at New Orleans, San Francisco, Hawaii, and Newfoundland, Canada, and pursuant to special arrangements, by HF Coast stations in other countries. Through its facilities and the

use of most modern technologies, HF data, facsimile, and electronics mail services are provided to ships at sea on a global basis.

## **II. COMMISSION'S CONCLUSIONS ON DIGITAL SELECTIVE CALLING (DSC) AND AUTOMATIC INTERCONNECTION WITH PSTN SUPPORTED**

Globe Wireless notes the discussion in Section A of the Further Notice but holds to its view that DSC is not the most efficient way to minimize connect time or to increase spectrum efficiency. Commercial service providers, on a worldwide basis, are not planning to use DSC for commercial communications purposes.

In paragraph 5 of the Further Notice there is reference to "including the capability to interconnect automatically with the PSTN via DSC signalling as a minimum requirement." Globe Wireless feels the ability to interconnect with the PSTN, especially using DSC, is not an important safety requirement. Further, DSC should not be mandated for this purpose because it would be too restrictive. As pointed out in paragraph 7 of the discussion, Globe Wireless (through KFS World Communications (KFS)) has already expressed support for the use of any "open" protocol, including DSC, for non-distress communications. Globe Wireless does continue to support DSC as the sole selective calling protocol for distress communications. Finally, Globe Wireless support the conclusions expressed in the Further Notice at paragraphs 8, 9 and 10.

With regard to automatic interconnection with PSTN, Globe Wireless supports the Commission's proposals as set forth in paragraph 13 of the Further Notice.

## **III. NARROW-BAND DIRECT PRINTING (NB-DP)**

Paragraphs 14-19 of the Further Notice are considered an excellent discussion and

summary of the NB-DP situation. Globe Wireless agrees that Selcall should continue to be a requirement for stations participating in NB-DP. The proposals set forth in paragraphs 17, 18, and 19 are all supported.

#### **IV. PERMISSIBLE COMMUNICATIONS**

Globe Wireless, noting the discussion in paragraphs 21 and 22, supports the Commission's proposal to permit all public coast stations to provide service to land vehicles under their current coast station license. Such operations should be on a secondary basis to maritime communications as set forth in paragraphs 23 and 24.

Noting the discussion of prevention of channel warehousing in paragraph 24, Globe Wireless favors making anti-warehousing measures less burdensome. The Commission's proposal is considered reasonable. By way of comment, increased business often comes only after the service provider is able to offer adequate channel options during peak hours. Having to justify the requirement in advance often places the service provider at a competitive disadvantage.

#### **V. INTRA-SERVICE FREQUENCY SHARING**

Globe Wireless concurs with sharing of 2 MHz frequencies but agrees with other commenters that the 4 MHz band, due to congestion and limited availability of spectrum should not, at this time be shared. The proposal to assign specific simplex VHF channels regionally for specific types of operations where safety is critical is a spectrum efficient solution. Otherwise, Globe Wireless concurs with the commercial/non-commercial decision for the VHF band and the establishment of a "Vessel Operations" category. The reservation of certain categories such as port operations and intership safety is likewise concurred in.

## **VI. TRUNKING/NARROWBAND**

Both trunking and narrowbanding involve many technical, operational, and safety considerations making a meaningful response to the questions posed in paragraph 28 difficult. Globe Wireless suggests there is a vast amount of expertise available within the marine communications industry and some of it could be focussed on trunking and narrowbanding. Noting this, it is proposed that the Commission establish a technical advisory committee to study options and to make recommendations. The pros, cons, and ramifications of the many technical options are so numerous that it is unrealistic to resolve them through a rulemaking action. One possibility would be to invite RTCM to establish a study project on trunking/narrowbanding and report its conclusions back to the Commission. Undertaking a "negotiated rulemaking" might be another approach.

## **VII. HF AUTOMATIC LINK ESTABLISHMENT (ALE)**

Globe Wireless suggests there are methods of ALE available and still others under development. For this reason, the Commission's Rules should not designate any single method as the only acceptable method. Communications technology and the marketplace will eventually determine the minimum viable requirements. Commenting further on the questions posed in Paragraph 39, a standard modulation should not be mandated, power should be limited, specific frequencies should be protected, only one radiation per land base site per band should be allowed, and signalling should not be allowed on any kind of data channel unless it can be proven that the proposed technology will not cause harmful interference to existing service.

**VII. SHIP-TO-SHIP AND SHIP-TO-PRIVATE  
COAST STATION FACSIMILE**

The discussion and Commission's proposed action in paragraphs 40 and 41 are noted without objection or comment. In response to the questions posed in paragraph 42. Globe Wireless feels that facsimile and all types of data communications should be allowed on VHF maritime channels throughout the USA. It should be sufficient for the Commission to ensure that the basic bandwidth and non-interference requirements be respected. Maritime communications, whether voice or data, are of equal importance hence there is no apparent advantage in placing any restrictions on data/FAX communications of VHF commercial communications channels.

**IX. NEED FOR U.S. DELEGATION TO WRC-95  
TO PROPOSE THAT ITU EXPAND THE AGENDA  
PROPOSED FOR WRC-97 TO INCLUDE AN ITEM  
TO REVISE CHAPTER XI OF THE RADIO  
REGULATIONS TO PERMIT USE OF NEW  
TECHNOLOGIES IN THE MARITIME SERVICE**

The Further Notice addresses many items. Some relate to implementation of past changes in international standards and others to items already identified for inclusion in the planned WRC-97 agenda. Other issues in the Further Notice represent departures from international protocols for the maritime services. These other issues are not presently included in the WRC-97 agenda and should be added thereto. For example:

- (a) Issues concerning the narrow-band direct-printing service (NB-DP).

The Commission proposes to provide flexibility in NB-DP operations, subject to compliance with bandwidth and related limitations to prevent harmful interference to other users. Furthermore, the Commission proposes to permit use

of linear frequency modulated continuous wave modulation technology for the purpose of Automatic Link Establishment (ALE) in the Maritime HF frequency bands. The proposal will substantially enhance terrestrial maritime communications but still requires a modification to the ITU Radio Regulations.

(b) With regard to both the NB-DP and the ALE issues, international acceptance of the operating flexibility contemplated by the Commission is critical to its successful implementation. The overwhelming majority of ocean-going vessels are operated under foreign flags. Accordingly, the international community must support the changes contemplated by the Commission in order to facilitate the full realization of benefits from improvements in HF technology.

Addition of Chapter XI (specifically Articles 59 through 65 of the Radio Regulations) would not create a significant extra burden on WRC-97 as changes to the International Table of Frequency Allocations contained in Article 8 of the Radio Regulations would not be involved. As in other telecommunications services, changes to bring new technologies to the maritime services are and have been taking place. WRC-97 would permit a belated but still timely update of Chapter XI without undue burdens to the U.S. Delegation to WRC-95. A wholesale revision of Chapter XI would not be called for nor needed at WRC-97.

By letter dated June 6, 1995, Globe Wireless requested the Chief of the FCC International Bureau to advance a U.S. proposal for the WRC-97 agenda to be expanded to include additional Articles of Chapter XI of the ITU Radio Regulations rather than just Article

61 as now proposed. Chapter XI deals with the "Maritime Mobile Service and Maritime Mobile-Satellite Service." The subject is under discussion now in the U.S. preparatory process for WRC-95.

Globe Wireless notes also that Mobile Marine Radio Inc. (MMR) in Comments to the Commission on IB Docket 94-31 raises in a more general way most of the same issues as was set forth in the above mentioned June 6, 1995 letter. The difference is that Globe Wireless identified several specific examples of changes that should be made to the ITU Radio Regulations. However, Globe Wireless concurs completely with MMR in urging the Commission to "support inclusion in the recommended agenda for the 1997 WRC of an item or items dealing with modernization of HF Maritime communications standards . . . ."

The ability to apply new technologies in the Maritime Service requires cooperation with telecommunications regulatory authorities throughout the world. For this reason, provisions of the ITU Radio Regulations are significant and relevant to the complete implementation of the proposals being considered in the Further Notice.

## **X. CONCLUSION**

In conclusion, Globe Wireless:

- (a) Supports the great majority of the proposals set forth in the Further Notice
- (b) As regards Trunking/Narrowbanding, more study is needed because of the many technical, operational, and safety considerations. The expertise is available within the maritime



industry for such a study (which could be done by RTCM, for example).

- (c) Urges the Commission to take into account its response to questions posed in the Further Notice.
- (d) Emphasizes that since maritime communications are generally international in character, prompt action should be taken by the U.S. to propose changes at WRC-95/WRC-97 that would amend the International Telecommunications Union (ITU) Radio Regulations to make possible the implementation of all proposals at the Third Notice.

In closing, the Commission is urged to proceed to Rulemaking in this proceeding taking the above comments into account. Finally, Globe Wireless applauds the Commission on its continued efforts to provide an adaptive regulations environment. It is a positive contribution to safety of life at sea and to the advancement of cost effective commercial communications for the maritime industry.

Respectfully submitted,

GLOBE WIRELESS

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September 22, 1995  
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